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May 13, 2024

VIA ECF

Hon. Margaret M. Garnett
 District Court Judge
 US District Court for the Southern District of New York
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl St.
 New York, NY 10007-1312

Re: **Dennis Dumas v. Kroll, LLC - Civil Action No. 1:23-cv-05013-MMG**

Dear Judge Garnett:

We represent Defendant Kroll, LLC ("Kroll") in the above-captioned action. Together with Plaintiff's Counsel, we write in accordance with Rule I(B)(5) of your Honor's Individual Rules of Practice to request a 21-day extension of the deadline for Kroll to file its motion for summary judgment under Rule 56 of the Federal Rule of Civil Procedure from May 30, 2025 to June 20, 2025, with corresponding extensions of the remaining submissions. An extension is necessary because of Kroll's counsel's unavailability due to a family illness and upcoming maternity leave.

On December 11, 2024, this Court granted Kroll's letter motion requesting leave to file its summary judgment motion and set May 30, 2025 as the deadline for Kroll's summary judgment brief. (ECF No. 38.) An extension is necessary because undersigned counsel will be out of office for the week of May 26, 2025 due to schedule surgery and cancer treatment for his mother as well as the departure of co-counsel for maternity leave starting on May 12, 2025. Thus, the parties respectfully propose the following revised briefing schedule for the submission of Kroll's motion for summary judgement:

- **June 20, 2025**: Kroll's deadline to file its motion for summary judgment.
- **July 18, 2025**: Plaintiff's deadline to file his opposition brief.
- **August 1, 2025**: Kroll's deadline to file its reply brief in support of summary judgment.

If granted, no other deadlines will be effected in this action because the parties will have completed pending pre-trial discovery and no other pre-trial submissions are currently due. This is Kroll's first request for an extension of the summary judgment briefing deadline, and this request is made in good faith and not for the purpose of unnecessary delay.

The parties thank you for Your Honor's kind consideration of this request.

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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Ephraim J. Pierre

Ephraim J. Pierre

Enclosures

cc: Counsel of Record (via ECF)

Application GRANTED. The summary judgment briefing schedule shall be ADJOURNED as follows: Defendant's moving papers shall be due no later than **June 20, 2025**; Plaintiff's opposition shall be due no later than **July 18, 2025**; and Defendant's reply shall be due no later than **August 1, 2025**. The Clerk of Court is respectfully directed to terminate Dkt. No. 39.

SO ORDERED. Date: 5/14/2025.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE